

Monroe, LA	B-304	324,397	\$3.03	\$	982,113
Atlantic City, NJ	B-026	319,418	\$12.84	\$	4,100,000
<del>Atlanta, GA</del>	<del>B-018</del>	<del>318,338</del>	<del>\$1.06</del>	<del>\$</del>	<del>341,000</del>
<del>Atlanta, GA</del>	<del>B-073</del>	<del>307,177</del>	<del>\$2.78</del>	<del>\$</del>	<del>1,524,000</del>
Elmira-Corning-Hornell, NY	B-127	318,038	\$2.91	\$	917,777
Green Bay, WI	B-173	310,436	\$3.78	\$	1,177,777
Lincoln, NE	B-256	309,818	\$6.00	\$	1,847,578
Anderson, SC	B-018	309,120	\$4.00	\$	1,220,480
Fargo, ND	B-136	298,018	\$2.98	\$	890,113
La Crosse, RW-Winona, MN	B-234	296,788	\$4.84	\$	1,438,000
Longview-Marshall, TX	B-260	292,668	\$1.80	\$	469,080
Hickory-Lenoir-Morgantown, NC	B-189	292,408	\$3.86	\$	1,128,000
Temple-Killeen, TX	B-441	291,788	\$3.38	\$	978,450
Tupelo-Corinth, MS	B-448	291,701	\$3.34	\$	975,000
Billings, MT	B-041	290,242	\$2.30	\$	868,777
Eugene-Springfield, OR	B-133	282,912	\$4.00	\$	1,131,648
Fort Smith, AR	B-153	282,187	\$2.61	\$	708,300
Alexandria, LA	B-006	280,133	\$3.29	\$	914,113
Brownsville-Harlingen, TX	B-056	277,825	\$4.00	\$	1,111,300
Erie, PA	B-131	278,872	\$2.31	\$	837,777
Waco, TX	B-459	270,062	\$1.85	\$	444,878
Tyler, TX	B-452	268,782	\$2.50	\$	675,050
Provo-Orem, UT	B-365	268,407	\$2.49	\$	671,102
Pueblo, CO	B-368	266,001	\$2.68	\$	713,000
Houma-Thibodaux, LA	B-185	263,681	\$3.70	\$	978,023
Cedar Rapids, IA	B-070	260,696	\$2.30	\$	600,006
Gainesville, FL	B-169	260,538	\$5.80	\$	1,469,000
Lake Charles, LA	B-238	259,425	\$2.31	\$	598,013
Olympia-Centralia, WA	B-331	258,937	\$7.49	\$	1,990,033
Jackson, TN	B-211	255,379	\$3.05	\$	779,000
Springfield, IL	B-426	254,896	\$3.34	\$	850,000
Redding, CA	B-371	253,286	\$1.82	\$	481,000
Arlene, TX	B-003	253,174	\$2.02	\$	512,218
Dover, DE	B-116	251,257	\$8.89	\$	1,881,000
Lima, OH	B-255	249,734	\$3.43	\$	857,000
Wilmington, NC	B-478	249,711	\$4.05	\$	1,012,000
Decatur-Effingham, IL	B-109	247,908	\$2.42	\$	600,000
Lafayette, IN	B-235	247,823	\$6.81	\$	1,885,750
Topeka, KS	B-445	245,879	\$4.00	\$	982,716
Mankato-Fairmont, MN	B-377	245,144	\$2.33	\$	570,113
St. Cloud, MN	B-391	243,888	\$2.91	\$	710,113
Johnstown, PA	B-218	241,347	\$1.30	\$	314,886
Olean, NY-Bradford, PA	B-330	239,343	\$1.71	\$	409,810
Florence, SC	B-147	238,208	\$5.30	\$	1,267,408
Tuscaloosa, AL	B-450	237,918	\$2.73	\$	648,101
Terre Haute, IN	B-442	238,968	\$5.33	\$	1,262,550
Elkhart, IN	B-126	235,152	\$3.33	\$	783,282
Rochester-Austin-Albert Lea, MN	B-378	233,167	\$3.00	\$	699,501

Battle Creek, MI	B-033	227,841	\$6.34	\$	1,214,282
Altoona, PA	B-012	223,828	\$1.23	\$	295,655
Fayetteville-Springdale-Rogers, AR	B-140	222,828	\$2.38	\$	523,006
Champaign-Urbana, IL	B-071	222,312	\$3.18	\$	701,000
Lawton-Auburn, ME	B-251	221,997	\$1.80	\$	400,103
Mansfield, OH	B-278	221,514	\$1.99	\$	439,906
Clarksville, TN-Hopkinsville, KY	B-083	220,488	\$1.95	\$	430,000
Wausau-Rhinelander, WI	B-098	220,040	\$3.53	\$	776,000
Wheeling, WV	B-471	219,837	\$1.34	\$	296,312
Greenville-Washington, NC	B-178	218,837	\$1.70	\$	372,038
Bloomington-Bedford, IN	B-047	217,814	\$2.21	\$	482,262
Gladstone-Kinston, NC	B-165	217,319	\$1.71	\$	372,038
San Luis Obispo, CA	B-405	217,182	\$6.72	\$	1,243,107
Pedee-Murray-Mayfield, KY	B-339	217,082	\$1.81	\$	348,502
Bloomington, IL	B-048	216,786	\$2.80	\$	540,000
Yelm, WA	B-482	215,548	\$2.38	\$	506,033
Joplin, MO-Miami, OK	B-230	215,098	\$3.78	\$	809,000
Jenerville-Selkirk, WI	B-218	214,810	\$3.98	\$	853,000
Greenville-Greenwood, MS	B-175	213,843	\$1.21	\$	259,102
Grand Forks, ND	B-186	213,832	\$2.34	\$	500,113
Odessa, TX	B-327	213,430	\$2.53	\$	540,045
Dothan-Enterprise, AL	B-118	210,225	\$3.46	\$	728,501
Carbondale-Marion, IL	B-067	209,487	\$3.32	\$	485,000
Wichita Falls, TX	B-473	209,339	\$2.86	\$	655,033
Medford-Grants Pass, OR	B-288	209,038	\$2.66	\$	555,102
Sioux Falls, SD	B-422	207,716	\$4.18	\$	870,232
Muskogee, MI	B-310	206,874	\$2.71	\$	601,000
Chico-Oroville, CA	B-079	206,818	\$2.50	\$	517,295
Traverse City, MI	B-448	204,800	\$5.23	\$	1,089,058
Hyannis, MA	B-301	204,286	\$9.06	\$	1,850,802
Stevens Point-Marshfield-Wisconsin Rapids, WI	B-432	201,240	\$3.15	\$	633,000
Meridian, MS	B-392	200,024	\$4.34	\$	868,000
Rocky Mount-Wilson, NC	B-382	199,296	\$2.06	\$	410,000
Las Cruces, NM	B-244	187,186	\$12.00	\$	2,366,488
Osaka, FL	B-328	184,233	\$4.78	\$	931,100
Jackson, MI	B-208	183,187	\$2.17	\$	418,282
Merced, CA	B-291	182,708	\$2.80	\$	639,574
St. Joseph, MO	B-393	181,489	\$2.28	\$	431,800
Columbia, MO	B-090	180,536	\$2.50	\$	477,000
Clarksburg-Elkins, WV	B-052	180,488	\$1.30	\$	248,001
Idaho Falls, ID	B-202	180,267	\$2.55	\$	488,000
Charlottesville, VA	B-076	180,128	\$3.36	\$	638,186
Bremerton, WA	B-066	180,731	\$4.40	\$	834,033
Grand Junction, CO	B-188	187,082	\$5.36	\$	1,000,000
Jamestown, NY-Warren, PA-Dunkirk, NY	B-215	186,948	\$2.97	\$	656,018
Fort Collins-Loveland, CO	B-148	184,134	\$5.08	\$	945,000
Williamson, WV-Pikeville, KY	B-474	186,982	\$1.50	\$	297,100
Kokomo-Logansport, IN	B-233	184,899	\$8.65	\$	1,228,885
Blairfield, WV	B-048	184,020	\$1.34	\$	280,000

Muncie, IN	B-309	182,386	\$1.57	\$	288,282
Cape Girardeau-Sikeston, MO	B-088	181,798	\$2.02	\$	368,000
Eau Claire, WI	B-123	180,669	\$3.30	\$	598,000
Perkersonburg, WV-Marietta, OH	B-342	180,028	\$1.80	\$	370,167
Anderson, IN	B-016	178,808	\$1.57	\$	280,282
Zanesville-Cambridge, OH	B-487	178,178	\$1.53	\$	273,483
Lawton-Duncan, OK	B-348	177,830	\$2.28	\$	400,288
Quincy, IL-Hannibal, MO	B-367	177,213	\$2.68	\$	478,000
Santa Fe, NM	B-407	174,828	\$15.27	\$	2,848,768
Gadsden, AL	B-158	174,034	\$2.44	\$	428,000
Florence, AL	B-148	173,878	\$1.60	\$	277,777
Fort Walton Beach, FL	B-184	171,838	\$8.17	\$	1,400,782
Panama City, FL	B-340	171,188	\$3.59	\$	818,800
Gainesville, GA	B-160	170,388	\$4.24	\$	723,001
Lebanon-Clermont, NH	B-249	167,578	\$2.40	\$	402,167
Bleckley, WV	B-036	167,112	\$1.33	\$	222,000
Wenatchee, WA	B-468	166,863	\$1.83	\$	330,000
Columbus-Starkville, MS	B-094	166,418	\$2.18	\$	382,000
Athens, GA	B-022	166,030	\$4.34	\$	721,000
Waterville-Augusta, ME	B-465	165,671	\$1.80	\$	263,000
Danville, VA	B-104	165,434	\$1.80	\$	265,102
Salisbury, MD	B-308	163,043	\$2.87	\$	436,011
Farmington, NM-Durango, CO	B-139	162,778	\$4.96	\$	808,100
Williamsport, PA	B-475	161,988	\$1.70	\$	278,011
Anniston, AL	B-017	161,887	\$3.43	\$	565,556
Hattiesburg, MS	B-188	161,884	\$3.34	\$	540,006
Benton Harbor, MI	B-039	161,378	\$2.88	\$	428,292
Great Falls, MT	B-171	161,036	\$1.88	\$	281,200
Owensboro, KY	B-338	157,104	\$1.30	\$	204,000
Cumberland, MD	B-100	156,707	\$2.23	\$	380,000
San Angelo, TX	B-400	155,845	\$3.52	\$	548,048
New Bern, NC	B-318	154,855	\$1.78	\$	273,818
Lynchburg, VA	B-268	154,497	\$2.96	\$	457,008
Pine Bluff, AR	B-346	152,918	\$2.67	\$	377,777
Laredo, TX	B-242	152,881	\$3.61	\$	562,033
Pottsville, PA	B-360	152,688	\$2.89	\$	410,011
Naples, FL	B-313	152,099	\$7.23	\$	1,100,000
Sherman-Denison, TX	B-418	151,914	\$4.48	\$	681,000
Walla Walla, WA-Pendleton, OR	B-460	151,563	\$2.21	\$	336,102
Bryan-College Station, TX	B-089	150,998	\$2.81	\$	425,010
Kennelworth-Peeco-Richland, WA	B-228	150,033	\$1.82	\$	243,008
Victoria, TX	B-454	149,963	\$1.80	\$	225,100
Jacksonville, NC	B-214	149,838	\$2.81	\$	381,000
Sumter, SC	B-436	149,824	\$2.84	\$	398,432
La Salle-Peru-Ottawa-Streator, IL	B-243	148,331	\$2.10	\$	312,000
Mustoge, OK	B-311	148,267	\$1.78	\$	294,008
Poplar Bluff, MO	B-358	148,240	\$2.87	\$	441,000
Clinton, LA-Steering, IL	B-086	147,881	\$1.81	\$	237,777

Findlay-Tiffin, OH	B-143	147,823	\$2.84	\$	380,000
Lufkin-Newspedoches, TX	B-388	144,081	\$2.40	\$	346,118
Myrtle Beach, SC	B-312	144,083	\$6.11	\$	848,000
Salina, KS	B-388	143,408	\$1.79	\$	288,462
Eureka, CA	B-134	142,878	\$2.13	\$	303,182
Staubenville, OH-Winton, WV	B-431	142,823	\$1.31	\$	187,098
Grand Island-Kearney, NE	B-167	141,841	\$4.08	\$	578,000
Jefferson City, MO	B-217	141,404	\$2.98	\$	421,000
Pittsfield, MA	B-381	139,363	\$4.89	\$	681,000
Missoula, MT	B-300	139,270	\$1.82	\$	228,000
Valdosta, GA	B-484	139,228	\$1.88	\$	283,000
Columbus, IN	B-093	138,128	\$2.47	\$	343,282
Winchester, VA	B-478	137,848	\$1.43	\$	187,108
Twin Falls, ID	B-461	136,831	\$1.81	\$	220,878
Casper-Gillette, WY	B-089	136,172	\$2.80	\$	378,000
Sandusky, OH	B-403	133,018	\$1.92	\$	286,000
Guam	B-490	133,000	\$5.86	\$	763,288
Greeley, CO	B-172	131,821	\$2.12	\$	411,111
Decatur, AL	B-108	131,868	\$3.61	\$	448,000
Harrisonburg, VA	B-183	128,910	\$1.68	\$	214,108
Corbin, Ky	B-098	128,188	\$1.81	\$	208,378
Bellingham, WA	B-038	127,780	\$3.89	\$	472,033
Kankakee, IL	B-228	127,043	\$1.80	\$	190,000
Fredericksburg, VA	B-156	124,884	\$1.78	\$	218,878
Opelika-Auburn, AL	B-334	124,022	\$3.83	\$	480,101
Athens, OH	B-023	123,884	\$1.80	\$	223,000
State College, PA	B-428	123,788	\$1.82	\$	225,011
Wilmar-Marshall, MN	B-477	123,748	\$1.81	\$	199,238
Bismarck, ND	B-045	123,682	\$1.82	\$	187,913
Plattsburg, NY	B-362	123,121	\$1.87	\$	230,000
Manhattan-Junction City, KS	B-278	122,878	\$4.48	\$	560,000
Yuba City-Marysville, CA	B-488	122,843	\$2.41	\$	288,000
Gallup, NM	B-162	122,277	\$4.18	\$	507,110
Sharon, PA	B-418	121,003	\$1.30	\$	187,001
Hilo, HI	B-180	120,317	\$7.07	\$	880,476
Fergus Falls, MN	B-142	120,187	\$1.82	\$	194,113
Mount Vernon-Centralia, IL	B-308	119,388	\$2.03	\$	242,800
Mason City, IA	B-288	118,834	\$1.88	\$	187,287
Mount Pleasant, MI	B-307	118,858	\$2.34	\$	277,000
Glen Falls, NY	B-184	118,838	\$2.81	\$	287,833
Cookeville, TN	B-096	117,813	\$4.62	\$	632,000
Hot Springs, AR	B-183	117,438	\$1.81	\$	177,001
Iowa City, IA	B-208	115,731	\$3.40	\$	384,000
Rome, GA	B-384	115,088	\$1.88	\$	227,800

Orangeburg, SC	B-338	114,468	\$2.67	\$	304,000
Danville, IL	B-168	114,841	\$2.31	\$	378,481
Norfolk, NE	B-323	112,889	\$3.83	\$	408,000
Keene, NH	B-227	111,709	\$1.81	\$	180,183
Midland, TX	B-298	111,887	\$3.30	\$	388,000
Somerset, NY	B-423	111,487	\$1.81	\$	178,484
Lewistown-Morrow, ID	B-390	110,028	\$1.32	\$	148,008
El Centro-Calexico, CA	B-124	108,203	\$4.57	\$	808,008
Marion, IN	B-385	108,238	\$8.18	\$	872,888
East Liverpool-Salem, OH	B-122	108,278	\$1.30	\$	141,000
Burlington, NC	B-082	108,213	\$4.07	\$	448,288
Oneonta, NY	B-333	107,743	\$1.80	\$	172,000
Prescott, AZ	B-382	107,714	\$8.84	\$	807,000
McComb-Brookhaven, MS	B-288	107,298	\$3.10	\$	333,917
Michigan City-La Porte, IN	B-294	107,088	\$2.80	\$	308,283
Yuma, AZ	B-488	106,888	\$3.28	\$	347,888
Oil City-Franklin, PA	B-328	106,882	\$4.30	\$	428,881
Richmond, IN	B-373	104,843	\$1.88	\$	188,882
Morgantown, WV	B-308	104,848	\$1.30	\$	138,881
Cheyenne, WY	B-077	103,838	\$3.82	\$	388,848
Rahmeyer, WI	B-417	103,877	\$3.40	\$	358,888
Dand, OR	B-038	102,748	\$2.88	\$	287,888
U.S. Virgin Islands	B-481	102,000	\$28.38	\$	2,888,788
Scottsbluff, NE	B-411	101,888	\$3.83	\$	388,888
Eagle Pass-Oil Rio, TX	B-121	100,813	\$2.88	\$	288,888
Kahului-Wailuku-Lahaina, HI	B-222	100,804	\$11.88	\$	1,188,878
Staunton-Wayneboro, VA	B-430	100,322	\$4.48	\$	488,188
Ashabula, OH	B-021	88,821	\$1.30	\$	138,881
Waycross, GA	B-487	88,824	\$1.83	\$	181,888
Dalton, GA	B-102	88,808	\$1.88	\$	188,288
Rolls, MO	B-383	88,233	\$3.80	\$	288,888
Portland-Bennington, VT	B-388	87,887	\$1.34	\$	121,188
Sierra Vista-Douglas, AZ	B-420	87,824	\$3.87	\$	388,888
Worthington, MN	B-481	86,802	\$1.81	\$	188,188
Flagstaff, AZ	B-144	86,801	\$7.28	\$	788,888
New Castle, PA	B-317	86,848	\$1.88	\$	188,888
Stoddard, PA	B-438	86,788	\$3.81	\$	288,811
Hammond, LA	B-180	83,883	\$3.82	\$	388,888
Roseburg, OR	B-388	84,848	\$1.30	\$	123,182
Rutledge, NY	B-208	84,887	\$3.38	\$	318,288
Vincennes-Washington, IN	B-457	83,758	\$1.88	\$	178,282
Chillicothe, OH	B-080	83,878	\$2.78	\$	287,342
Portsmouth, OH	B-388	83,388	\$1.80	\$	188,888
Marion, OH	B-281	82,823	\$1.81	\$	148,881
Adrian, MI	B-003	81,478	\$1.97	\$	188,282
Hammond-Parsons, MO	B-111	80,821	\$1.78	\$	188,888
Marionville, VA	B-111	80,821	\$1.81	\$	148,182
Fond du Lac, MN	B-143	80,883	\$3.83	\$	288,888

Pocatello, ID	B-383	89,641	\$1.01	\$	144,000
Paris, TX	B-341	89,422	\$1.83	\$	148,111
Aberdeen, SD	B-001	88,891	\$1.53	\$	138,001
Cleveland, TN	B-086	87,365	\$1.40	\$	122,004
Prague Isle, ME	B-383	86,838	\$1.82	\$	132,100
Meadville, PA	B-287	86,189	\$1.30	\$	112,801
Enid, OK	B-130	86,098	\$1.58	\$	143,162
Dubuque, MI	B-345	85,883	\$4.01	\$	430,174
Minneapolis, MN	B-345	85,883	\$1.30	\$	130,000
Minneapolis, SD	B-301	84,085	\$1.74	\$	148,180
Ardmore, OK	B-018	83,979	\$2.26	\$	180,001
St. George, UT	B-382	83,283	\$4.87	\$	408,101
Aberdeen, WA	B-002	83,067	\$1.30	\$	108,011
Russellville, AR	B-387	81,863	\$1.53	\$	128,000
Lawrence, KS	B-347	81,788	\$4.00	\$	337,162
Manitowoc, WI	B-278	80,421	\$3.78	\$	304,800
North Platte, NE	B-328	80,249	\$4.51	\$	381,830
Marquette, MI	B-282	78,689	\$1.78	\$	138,764
Sedalia, MO	B-414	78,799	\$1.82	\$	183,000
Coos Bay-North Bend, OR	B-097	78,400	\$1.82	\$	129,102
Blytheville, AR	B-048	78,448	\$1.31	\$	104,104
Laurel, MS	B-344	78,148	\$3.17	\$	261,048
Brainerd, ND	B-064	78,488	\$2.00	\$	184,930
Port Angeles, WA	B-356	78,810	\$2.31	\$	177,000
Roanoke Rapids, NC	B-377	78,314	\$2.88	\$	218,162
Galesburg, IL	B-181	78,874	\$2.11	\$	169,500
Klamath Falls, OR	B-231	74,848	\$1.95	\$	146,201
Waterloo, SD	B-484	74,886	\$1.98	\$	147,660
Harrison, AR	B-182	74,488	\$1.37	\$	102,981
Belma, AL	B-416	74,467	\$2.17	\$	181,241
Natchez, MS	B-318	73,314	\$2.32	\$	170,009
Hastings, NE	B-185	72,833	\$2.41	\$	178,686
Stillwater, OK	B-433	72,562	\$2.88	\$	187,000
Brunswick, GA	B-068	71,130	\$3.78	\$	289,008
Clovis, NM	B-087	71,024	\$3.70	\$	283,000
Jacksonville, IL	B-213	70,788	\$1.85	\$	106,000
Roswell, NM	B-388	70,088	\$4.07	\$	286,000
Juneau-Ketchikan, AK	B-221	68,889	\$1.82	\$	111,800
Greenwood, SC	B-178	68,436	\$2.00	\$	126,870
West Plains, MO	B-470	67,188	\$1.81	\$	108,200
Marquette, WI-Menominee, MI	B-279	66,488	\$1.41	\$	82,318
Butte, MT	B-064	66,282	\$1.88	\$	121,800
Deerman, MT	B-083	66,077	\$2.82	\$	183,994
Oarden City, KS	B-163	65,059	\$2.13	\$	138,750
La Grange, CA	B-327	64,184	\$2.87	\$	184,101
Coffeyville, KS	B-084	63,804	\$3.68	\$	233,022
Alpena, MI	B-011	63,428	\$1.38	\$	87,216
Nettson, IL	B-286	62,514	\$1.82	\$	101,000
Maye, KS	B-167	60,828	\$1.23	\$	78,001

Vicksburg, MS	B-455	89,350	\$3.22	\$	191,000
Kajlopell, MT	B-224	99,219	\$1.72	\$	102,000
Holena, MT	B-188	68,782	\$2.38	\$	160,000
Brownwood, TX	B-057	87,884	\$2.96	\$	171,000
Berndt, MN	B-037	87,832	\$1.78	\$	103,113
Fairmont, WY	B-137	87,248	\$1.28	\$	74,100
Rack Springs, WY	B-381	66,881	\$2.81	\$	180,000
Hubbs, NM	B-181	66,785	\$7.17	\$	480,000
Wicksville, MO	B-230	55,563	\$1.30	\$	72,011
Liberal, KS	B-283	63,360	\$1.32	\$	71,181
Ada, OK	B-004	82,877	\$2.41	\$	127,018
Linus, HI	B-264	81,177	\$13.30	\$	886,788
Sault Ste Marie, MI	B-408	81,041	\$2.10	\$	187,187
McAlester, OK	B-287	80,914	\$8.17	\$	283,003
Carlsbad, NM	B-088	42,808	\$8.70	\$	277,000
Bartlesville, OK	B-031	42,886	\$2.73	\$	131,033
Ponca City, OK	B-384	42,868	\$1.23	\$	84,118
American Samoa	B-482	47,000	\$1.84	\$	77,800
Riverton, WY	B-376	46,859	\$2.80	\$	131,000
Emporia, KS	B-129	46,187	\$3.23	\$	150,000
Madisonville, KY	B-272	46,128	\$1.88	\$	78,800
Escanaba, MI	B-132	46,082	\$1.41	\$	64,978
Houghton, MI	B-184	46,101	\$1.75	\$	78,927
Iron Mountain, MI	B-206	44,586	\$1.71	\$	78,153
Logan, WY	B-288	43,032	\$1.88	\$	84,000
Northern Mariana Islands	B-483	43,000	\$1.48	\$	84,000
Great Bend, KS	B-170	40,779	\$1.30	\$	63,001
Dickinson, ND	B-113	38,001	\$1.32	\$	80,200
Dodge City, KS	B-114	37,484	\$1.28	\$	48,728
McCook, NE	B-270	36,618	\$2.78	\$	101,888
Big Spring, TX	B-040	34,889	\$4.18	\$	144,000
Ironwood, MI	B-207	33,069	\$2.42	\$	80,060
Nogales, AZ	B-322	29,878	\$19.46	\$	388,018
Williston, ND	B-478	27,512	\$8.34	\$	287,000





**San Mateo Group, Inc.**  
**3 Waters Park Drive**  
**Suite 231**  
**San Mateo, Ca 94403**

Phone: 415-574-4747  
Fax: 415-349-8150

URGENT.

To: Mike Sullivan  
Company: Williamson Barker  
Fax #:  
From: Anthony T. Easton  
Date: 1-24-'96  
Time: 9:50 am

Number of Pages, including cover page: 4

MESSAGE: Per conversation.

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TO: MIKE SULLIVAN DRAFT

**Statement from Anthony T. Easton concerning FCC Auction 5 PCS  
bidding on January 23, 1996 by PCS 2000 L.P.**

On January 23, 1996, I was the responsible person authorized to bid on behalf of PCS2000, L.P. for the FCC Auction 5 PCS auction.

Our bidding strategy this morning was to bid the minimum required bid amount for each market, and as late as possible in the bidding window. This is a continuation of our bidding strategy of the past several days. Our bidding system is highly automated and enables us to bid on multiple markets, with the bids being done the night before. This morning, however, there was an exception to this rule. Our bidding analysis was not completed until 1:45 AM, PST.

At approximately 8:45 AM, PST, I began to enter bids into our internal Excel Bid Entry System from the workstation at my desk. This internal bidding system has been used continuously since the first day of the auction.

This system allows the authorized bidder to review on-screen the previous day's high bids and to make new bids based on the minimum number of \$/POP or \$/market amounts. One simply highlights the desired market, and enters the sequence "Alt-F1" to select the market. The market bid is then entered by moving the cursor to the appropriate "\$/POP" or "Market Value" line and pushing the "SHIFT-ENTER" key combination.

I proceeded to do this for all markets desired to be bid on for the day. Upon completion of this task, I saved the file in one of our "scenarios" using the "ALT-F11 key", and sent the file to the FCC-UPLOAD section of our Novell network server for capture by the FCC bid entry 900 number system which resides on another machine in another office.

At this point, our FCC system bidding operator, one of our auction staff personnel, retrieved the file from the network server and uploaded it to the FCC - and left the market bids displayed on the screen until authorized to release the data as a final "bid" to the FCC.

In the meanwhile, I was reviewing the bids with another authorized member of the bidding team on the telephone to confirm that they were correct. It was decided that we should cancel our bids on several smaller markets: B094, B167, B397 and B269, along with B030 and B453 - if we could safely remove these markets from bidding this round - and still be above our minimum bidding unit requirement.

As there was about 18 minutes left to bid, I walked into our FCC bidding computer area which has the 486 PC on-line to the FCC bidding computer in Washington, and instructed the computer operator to manually remove these bids from the FCC on-line screen. This she did.

We then proceeded to review the FCC screen to make sure that the bid units were correct. I noted a discrepancy between our internal bid system and the FCC's screen and held the bid for several minutes. I noticed that one market which I had instructed to remove from our active bidding (B453) had not been removed from our bid. When this was done, however, the FCC system responded that we were now below our bidding unit minimum. I instructed that this market be re-added to the list, and the FCC screen then confirmed that we had sufficient pops. I compared this number with the bidding units displayed on my screen, and confirmed that both our internal system and the FCC's system appeared to be in sync and correct. Several of us (three people) then briefly reviewed the screen display for correctness and sent forward the bid to the FCC system.

I returned to my office, proceeded to re-save our internal Excel spread sheet and sent the bidding file forward again to the FCC internal bidding subdirectory on our Network server. I then did a master screen print of the entire records as displayed to me and a screen print of the specific markets bid (and amounts bid) displayed to me. I repeated this operation twice. One copy was initialed by me, along with date and time notations, and placed in a 3-ring binder of historic bid data we keep in our offices. The second copy was posted on our TODAY'S BID wall board for office staff to review.

Approximately two hours later, we were retrieving the FCC bid data from the FTP server (we find it impossible to get this data reliably any sooner here as our leased-line Internet connection via Netcom to the FCC FTP server - Infoserver.FCC.GOV - is usually swamped before this time, and our automated bid retrieval software often times out before all the necessary data files can be down-loaded to us. This, in fact, happened again this morning. By the time that we were able to download the FCC data and print it out, the bid withdrawal period had been closed by 15 minutes.

The staff then proceeded to run a series of automated reports known internally as our "Flash" reports which are used to determine key early results prior to a more detailed data base system process (which takes about 3-5 hours to do). To our horror, one of the staff members reviewing our "High Bid" results discovered the discrepancy in the B-324 Norfolk-Virginia Beach market. Our bid of \$11.01 per POP (\$18,006,000), the minimum allowed bid by the FCC, had instead become \$110.11 per POP (\$180,006,000)!

This was brought to my attention at once. I immediately called the FCC bid hotline and spoke with a member of the FCC staff and was given a fax number to fax our bid records to. I also faxed a copy to Mike Sullivan, FCC Counsel to the company.

This bid was not made intentionally by us, and is clearly in error. To the best of my knowledge, our computer system was operating properly, and the bid, as made, per my computer screen and our paper records, was \$11.01 per POP. We can only assume that somewhere in our procedures this morning, which combined both an uploaded file and a manual bid entry change, a clerical or computer error was made and an extra "zero" was added to the dollar bid amount for that specific market.

I swear that the above statement is true and correct to the best of my knowledge under penalty of perjury.

Signed,

Anthony T. Easton



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*[Handwritten signature]*

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Number of pages 2 (including cover page)

to: Name Ronit Milstein  
Company San Mateo Group  
Telephone 415- 574- 4747  
Fax 415- 349- 8150

from: Name Cynthia L. Hamilton  
Company \_\_\_\_\_  
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Comments



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1/24/96

Kir

To Whom It May Concern:

As of today, 1/24/96, I find that I am no longer able to work at San Mateo Group, Inc. I will send someone to pick up my final paycheck, along with my keyboard, footrest and cassette tapes on Friday, Jan 26.

Gynthia L. Hamilton

Cynthia d'Leus





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6. PLP. 12.0

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FAX TRANSMISSION COVER SHEET

DATE: January 25, 1996

CODE: 558

TO: Javier Lamoso, Fred Martinez, Terry Easton, & Quentin Breen FAX NO.: 1-415-349-8150

FROM: Mike Sullivan

RE: Draft of waiver request and <sup>discovery</sup> affidavits. Larry is also attaching a draft press release. We need to file early Friday to get this to the press and FCC in a timely fashion.

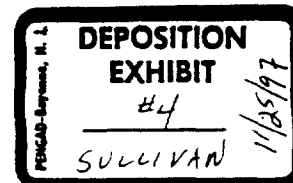
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FAX TRANSMISSION COVER SHEET

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DATE: January 25, 1996

CODE: 558

TO: Javier Lamoso, Fred Martinez, FAX No.: 1-415-349-8150  
Terry Easton, & Quentin Breen

FROM: Mike Sullivan

RE: *declarations*  
Draft of waiver request and affidavits. Larry is also attaching  
a draft press release. We need to file early Friday to get  
this to the press and FCC in a timely fashion.

NUMBER OF PAGES: \_\_\_\_, INCLUDING THIS COVER SHEET.  
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January 26, 1996

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: PCS 2000, L.P.  
Block C PCS Auction  
Request for Expedited Waiver or Reduction of Withdrawal Penalty

Attention: Kathleen Ham  
Chief, Auction Division  
Wireless Telecommunications Bureau

Dear Mr. Caton:

On January 23, 1995, PCS 2000, L.P. ("PCS 2000") erroneously submitted a bid in the Block C PCS auction for Market B324 for a price ten times as high as it intended. It informed the Commission immediately upon discovering the error and withdrew the bid the next day. PCS 2000 now asks the Commission to waive its withdrawal penalty rule. Imposing a penalty *potentially as large as \$162 million* on PCS 2000, a small business owned and controlled by women and minorities, for an *innocent error* will both destroy the company's ability to continue its aggressive participation in the auction and chill the willingness of other small businesses and entrepreneurs to bid.

Accordingly, PCS 2000 requests, pursuant to Section 24.819(a)(1) of the Rules, a waiver of the bid withdrawal penalty imposed by Section 24.704(a)(1) of the Rules for PCS 2000's withdrawal of its erroneous high bid of \$180,060,000 for the Block C license in Market B324 in Round 11. In the alternative, PCS 2000 requests that the penalty be very substantially reduced. PCS 2000 respectfully requests that action be expedited so that a resolution is achieved while the auction is ongoing. Delaying action until after the close of the auction would adversely affect the outcome of the auction.

### Background

In Round 11 of the Block C PCS auction, PCS 2000 entered bids for a number of markets, including Market B324. For each of these selected markets, PCS 2000 intended to, and believed at the time that it did, enter the minimum bid increment. For Market B324, the minimum bid increment would have resulted in a bid of \$18,006,000.00. Due to an error, the bid for this market was recorded by the Commission as \$180,060,000.00, exactly ten times as large as the intended bid. PCS 2000 discovered the error about two hours after the close of the bidding for Round 11, when it downloaded the round results from the FCC's internet FTP server. PCS 2000 immediately telephoned the FCC's auction contractor to indicate that it had intended to bid \$18,006,000.00 and to report that the \$180,060,000 bid was in error. Undersigned counsel also contacted officials of the Auction Division to inform them of the error. The Commission verified that the bid had been posted as received, and PCS 2000 withdrew the erroneous high bid of \$180,060,000.00 on January 24, 1996.

PCS 2000 has conducted a preliminary investigation of the error, but the precise cause of the erroneous bid remains unknown. The error appears to have occurred in PCS 2000's bid preparation and submission process and was likely caused by some combination of a departure from previously established internal procedures, human error, and the inability to conduct a complete cross-check of the submitted bids against other data prior to the conclusion of the bidding period because of a lack of time. In addition, discovery of the error was delayed because the FCC's confirmation of the bid was not received due to a printer malfunction. PCS 2000 is undertaking measures to ensure that there is no recurrence of these conditions.

PCS 2000 notes that some press reports have erroneously claimed that PCS 2000 attributes the error to the Commission. Because the results reported by the FCC did not reflect the bid that PCS 2000 believed it had submitted, the company contacted the FCC to determine whether an error had occurred in reporting the results. The FCC confirmed that it reported the results that had been submitted, and PCS 2000 has now concluded, as discussed above, that the error occurred in its own bid preparation and submission process and was *not* attributable to the Commission.

### Discussion

PCS 2000 submits that the public interest would be served by grant of a waiver (or, in the alternative, a substantial reduction in the penalty) in the unique circumstances of the instant case, that strict application of the prescribed penalty for withdrawing a bid would disserve the public interest, and that the purpose of the rule would not be undermined by a waiver. Prompt resolution of this is essential, because the lack of a decision will severely limit the ability of PCS 2000 to continue its active and aggressive participation in the auction and could adversely affect the willingness of other bidders to participate.

Waiver of the penalty rule under these circumstances would not establish a precedent that would create any opportunity for mischief in the future. The bid submitted in error by PCS 2000

was clearly in error and not an attempt to manipulate the bidding. The \$180,060,000.00 bid represented a per-pop price of \$110, which is vastly in excess of the likely value of this license. Indeed, the erroneous bid exceeded the previous high bid by 900%, at a time when PCS 2000 (and many other bidders) were making only the minimum bids necessary. All of PCS 2000's bids in Round 11, except the erroneous bid for Market B234, were the minimum permissible bid, and the erroneous bid was exactly ten times the minimum permissible bid of \$18,006,000.00. It is obvious that an extra zero was somehow accidentally added to the end of the bid amount. No reasonable bidder would have knowingly bid such a price for this license.

PCS 2000 promptly took steps to notify the Commission that an error appeared to have occurred. As Mr. Easton indicates in his declaration, immediately upon discovering that the FCC had recorded the bid as being \$180,060,000.00, he informed Mr. Louis Segalos, an official with the Commission's auction contractor, that an error had occurred. He supplied Mr. Segalos with copies of spreadsheet printouts indicating the bids that PCS 2000 believed it had submitted. Shortly thereafter, counsel informed the Auctions Division staff of the error. The erroneous bid was then withdrawn on January 24, 1996.

None of the participants in the C Block auction would be able to pay a penalty of this magnitude. It would vastly exceed the \$50 million upfront payment posted by PCS 2000 (and indeed would exceed any Block C bidder's upfront payment) and would, if not waived, render the company unable to acquire any licenses. Other bidders in the auction would be similarly affected by a penalty were they to make a similar mistake. Prompt action on this matter is needed to avoid chilling participation in the auction.

It is important to recognize that if PCS 2000 is subjected to this unduly burdensome penalty, its bidding capacity will be drastically reduced, if not eliminated. As a result, less money will be involved in the auction and licenses may well be undervalued. This would lead to spectrum being assigned on a less than optimal economic basis, instead of being assigned to those valuing most highly. A prompt waiver of the rule would ensure the integrity of the auction process as a whole and minimize any disruption to this process.

PCS 2000 regrets that the error occurred. Nevertheless, no party has suffered any harm as a result of the erroneous bid or its withdrawal. The error occurred relatively early in the auction and the bid was promptly withdrawn. As a result, any party wishing to bid for the market involved is able to do so.

Accordingly, PCS 2000 submits that waiver of the rule is warranted in the public interest and should be granted without delay.

Sincerely,

Wilkinson, Barker, Knauer & Quinn

By: Michael Deuel Sullivan

Counsel for PCS 2000, L.P.

cc: Kathleen O'Brian Ham  
Gerald P. Vaughan

**Declaration of Javier Lamoso**

I, Javier Lamoso, am the President of Unicom Corporation, the general partner in PCS 2000, L.P. I have read the foregoing "Request for Expedited Waiver or Reduction of Withdrawal Penalty" and declare under penalty of perjury that the statements therein are true and correct, on information and belief.

Executed:     January 26, 1996     \_\_\_\_\_



**Declaration of Anthony T. Easton**

I, Anthony T. Easton, am the Chief Executive Officer of Unicom Corporation, the general partner in PCS 2000, L.P.

I have read the foregoing "Request for Expedited Waiver or Reduction of Withdrawal Penalty" and the statements therein are true and correct to the best of my knowledge.

I supervised the preparation and submission of PCS 2000's bids for Round 11 of the C Block PCS auction, in which a bid was erroneously submitted for Market B324 in the amount of \$180,060,000 instead of the minimum bid of \$18,006,000. While PCS 2000 has been unable to determine the precise manner in which the error occurred, there are a number of ways in which the error could have occurred, in light of a departure, during Round 11, from the internal bidding procedures normally followed. The error is likely to have been the result of human error in entering data into the spreadsheet program PCS 2000 uses to prepare its bids. Normally, any such error would have been discovered and corrected during multiple cross-checking processes. Unfortunately, during Round 11 these cross-checking processes were not followed fully, because it became necessary to manually change certain bids on-line shortly before the close of the bidding round in order to comply with bidding eligibility and activity rules. As a result, there was not sufficient time to recheck the details of every bid. In addition, the printer that normally prints the FCC confirmation of bids received was not functioning, as a result of which PCS 2000 did not receive any confirmation that would have alerted the company to the error.

I declare under penalty of perjury that the foregoing is true and correct, based on personal knowledge and on information and belief.

Executed:     January 26, 1996